

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

11 DEC -1 PM 3:47

United States of America)
 v.)
)
 RICHARD CASTLE aka RICHARD PARKER)
 aka RICHARD JOSHUA PARKER aka JOSH FADE)
 aka JOSH)
 _____ Defendant(s)

Case No.

MICHAEL R. MERZ
 UNITED STATES
 MAGISTRATE JUDGE
 3:11 mj - 311

MICHAEL R. MERZ

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of _____ in the county of _____ in the
 Southern District of Ohio, the defendant(s) violated:

*Code Section**Offense Description*

SEE ATTACHMENT "A"

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.



Complainant's signature

SA MARK SALLQUM, DHS

Printed name and title



Judge's signature

MAGISTRATE JUDGE MICHAEL R. MERZ

Printed name and title

Sworn to before me and signed in my presence.

Date: November 1, 2011

City and state: DAYTON, OHIO

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT

I, Mark Salloum, a Special Agent with Homeland Security Investigations (HSI), being duly sworn, depose and state as follows:

INTRODUCTION

1. I am a HSI Special Agent (“S/A”), assigned to the Resident Agent in Charge (RAC) in Cincinnati, Ohio. I have been employed with HSI as a Special Agent since August, 2008. I graduated from the University of Akron, Akron, Ohio in August of 2000 with a Bachelor’s Degree in Education, and a Bachelor’s Degree in History in May of 2001. I completed my graduate studies at Cleveland State University, Cleveland, Ohio in December of 2002, with a Master’s Degree in History. As part of my duties as an HSI Special Agent, I investigate criminal violations relating to child pornography and child exploitation including violations pertaining to Coercion and Enticement of a Minor in violation of Title 18 U.S.C. § 2422(b); and violations pertaining to persons who Travel with Intent to Engage in Illicit Sexual Conduct with a Minor, in violation of Title 18 U.S.C. § 2423(b). I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography and child exploitation in various forms of media including computer media. In addition, I am a graduate of the Federal Law Enforcement Training Center (FLETC) Criminal Investigator Training Program (CITP), and Immigration and Customs Enforcement Special Agent Training (ICE-SAT), where I received training relative to conspiracy investigations, child pornography and exploitation investigations, general smuggling investigations, smuggling of arms and strategic technology, confidential source handling, drug identification, federal drug law, and various surveillance and investigative techniques.

2. I make this affidavit in support of an application for a criminal complaint and arrest warrant for Richard CASTLE , a resident of the United Kingdom, for violations of Title 18, United States Code, § 2422(b) Coercion and Enticement of a Minor, and Title 18, United States Code § 2423(b) Travel with intent to Engage in Illicit Sexual Conduct with a Minor. The statements contained in this affidavit are based upon my investigation, as well as information provided to me by other law enforcement officers.

3. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant against RICHARD CASTLE, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Richard CASTLE has committed violations of Title 18, United States Code, § 2422(b) and § 2423(b). Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part.

STATUTORY AUTHORITY

4. This Complaint is based on alleged violations of Title 18, United States Code, § 2422(b) (Coercion and Enticement of a Minor); and violations of Title 18 United States Code § 2423(b) (Travel with Intent to Engage in Illicit Sexual Conduct with a Minor).

Title 18, United States Code, §2422(b) provides in pertinent part that:

Whoever, using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall be fined under this title and imprisoned not less than 10 years or for life.

Title 18, United States Code, §2423(b) provides in pertinent part that:

A person who travels in interstate commerce or travels into the United States, or a United States citizen or an alien admitted for permanent residence in the United States who travels in foreign commerce, for the purpose of engaging in any illicit sexual conduct with another person shall be fined under this title or imprisoned not more than 30 years, or both.

DETAILS OF THE INVESTIGATION

5. In October 2011, a fourteen year old minor female, identified for purposes of this affidavit as “Minor A” confided in a school counselor at her middle school in the Dayton, Ohio area that she had sexual relations in the summer of 2011 with an adult male that she identified as Richard Joshua Parker. Based upon this information, the school counselor contacted the local police department. Upon interviewing “Minor A”, the local police department determined that sexual relations between the adult male and “Minor A” occurred at the Best Western Hotel located at 20 Rockridge Road, Englewood, Ohio. As such, the local police department referred the matter to the Englewood Police Department for investigation.

6. On October 13, 2011, Englewood Police Department (EPD) Detective Alan Meade (“Det. Meade”) traveled to the Best Western Motel located at 20 Rockridge Road, Englewood, Ohio, and spoke with an employee who worked as a desk clerk. The employee did not recall the name Richard Joshua Parker, however she did recall a man from England, named Richard CASTLE, who stayed at the Best Western for several weeks that summer. According to their records, CASTLE checked into the hotel on June 20, 2011 and stayed through July 8, 2011. The employee stated that CASTLE had a young white female with him. The employee further stated that CASTLE told her/him that the female was 18 years of age and that he was in love with her. The employee further described CASTLE as possibly being in his late 30’s, British accent, black

hair, wearing glasses and black fingernail polish. The employee also recalled that CASTLE wore “goth or rocker style” clothing. The employee also advised that CASTLE made his reservations via Travelocity. The employee further advised that, at CASTLE’s request, she provided him with information regarding the nearest rental car facility. The records from Best Western reveal that CASTLE originally booked the trip through Travelocity for a two-week trip, however, CASTLE then extended his stay for an additional week. CASTLE’s initial trip was paid for using an American Express card and his additional stay was paid for using a Visa card.

7. Continuing on October 13, 2011, Det. Meade traveled to a rental car facility in the vicinity - Dollar Rent A Car, located at 2700 West National Road, Vandalia, Ohio. After making contact with the Store Manager, Det. Meade asked if CASTLE had rented a vehicle in the past. The Store Manager confirmed that he had and then provided Detective Meade with two business records. The first indicated that CASTLE rented a Ford Taurus from June 25, 2011, to July 2, 2011. The second record indicated that CASTLE rented a different Ford Taurus from July 2, 2011, to July 9, 2011. Furthermore, the rental records indicated CASTLE’S current address as 118 Fullingdale Road, Northampton, Great Britain, NN3 2QJ.

8. Upon determining that this individual had traveled from his residence in Great Britain to the United States in June 2011, EPD Det. Meade contacted HSI S/A Mark Salloum and advised that the EPD was currently conducting an investigation of unlawful sexual conduct involving a fourteen (14) year old minor female and an adult male identified as Richard CASTLE a/k/a Richard Joshua Parker, a citizen/national of the United Kingdom. At Detective Meade’s request, S/A Salloum conducted record checks to verify if CASTLE had entered and departed the United States.

9. On October 14, 2011, S/A Salloum queried the Arrival and Departure Information System (ADIS) and confirmed CASTLE's entry into the United States on June 20, 2011, at Philadelphia International Airport (PHL), via US Airways flight 729. Upon entry, CASTLE declared his destination address to be 20 Rockridge Road, Englewood, Ohio, the address of the Best Western Motel. A query of the United States Visitor and Immigration Status Indicator Technology (US VISIT) also confirmed CASTLE's June 20, 2011 entry into the United States. The US VISIT record also included a photograph of CASTLE upon entry into the United States. An additional query of the Treasury Enforcement Communication System (TECS) indicated that CASTLE departed the United States on July 9, 2011, via Charlotte, North Carolina (NC), to London Gatwick on US Airways flight 732.

10. Upon confirming that CASTLE was no longer in the United States, SA Salloum agreed to adopt the case and contacted the United States Attorneys Office in the Southern District of Ohio to confirm that the case would be accepted for federal prosecution.

11. On October 20, 2011, S/A Salloum and HSI S/A Jason Kearns met with the mother of "Minor A" and received written consent to seize and search the laptop computer belonging to "Minor A". The computer was submitted to the Miami Valley Regional Computer Forensics Laboratory (MVRCFL) for analysis.

12. During the course of this investigation, "Minor A" was interviewed by local police officers and S/A Mark Salloum and relayed the following information regarding CASTLE. "Minor A" advised that in approximately March 2009 she was utilizing the website "BlogTV.com" (Blogtv.com is an Israeli based platform for user generated live broadcasts via webcams.) "Minor A" advised that she had signed up as a junior member and indicated that she was 13 years old

which was the minimum age necessary to open an account. (“Minor A” was in fact 12 years old at the time.) “Minor A” stated that she had posted a comment and an individual identified as “xrjpx” responded. “Minor A” further stated that the profile for “xrjpx” indicated that he was a 17 year old male and the photo depicted of him was overexposed. “Minor A” advised that “xrjpx” had a senior account which allowed him access to the website. When “Minor A” initially started chatting with “xrjpx” online, “xrjpx” told “Minor A” that he was seventeen (17) years old and “Minor A” informed CASTLE that she was thirteen (13) years old. During the course of their communications, “xrjps” informed “Minor A” that his name was Richard Joshua Parker (hereinafter identified as CASTLE) and that he resided in England. “Minor A” and “xrjpx” began communicating on a regular basis via Blogtv.com.

13. During the course of their online relationship, “Minor A” and CASTLE frequently communicated and chatted via various Internet media outlets to include, but not limited to electronic mail (e-mail), MSN Instant Messenger, Yahoo instant messaging, Skype and Facebook. In communicating with one another, “Minor A” and CASTLE used a number of screen names and identities on these various internet platforms. In addition, CASTLE made international phone calls to “Minor A” on her cellular telephone.

14. As the online relationship progressed, “Minor A” stated that they “started flirting.” Over the course of time, CASTLE e-mailed her a picture of his penis and she sent him numerous photos of her in which her breasts were exposed. “Minor A” advised that their chats were sexual in nature and escalated over time. “Minor A” advised that they referred to themselves as boyfriend and girlfriend. “Minor A” stated that during an instant message conversation with CASTLE in late spring 2011, CASTLE stated that he was going to visit her in the United States in

June 2011. "Minor A" advised that, based upon their communications, she believed that they would have sexual relations during his visit. "Minor A" further advised that every photograph that she had seen of CASTLE on the Internet was overexposed such that she could not clearly see his face and that every time they had webcam chats CASTLE explained that his web camera was not working properly.

15. During the course of her interviews, "Minor A" advised that when CASTLE arrived in the United States, they agreed to meet at Helke Park in Vandalia, Ohio. "Minor A" advised that CASTLE had obtained a U.S. based cellular telephone with which he communicated with her. Prior to arriving at Helke Park, CASTLE told "Minor A" that he was not seventeen years old (17) as he previously stated, but rather somewhere "between 20 and 40 years" of age.¹ CASTLE further stated to "Minor A" that "society wouldn't understand, but it was common for young girls to have relationships with musicians", or words to that effect. "Minor A" further stated that CASTLE was very manipulative and had a way with words.

16. "Minor A" advised that she went to Helke Park by herself and saw an individual whom she believed was CASTLE in the distance, however, there were technical problems with CASTLE's telephone and they were not able to speak with one another prior to her approaching him. As a result, "Minor A" left the park and waited for CASTLE to make contact with her. The following day, CASTLE contacted "Minor A" via telephone and explained that he had problems with his phone the day before and was unable to reach her. CASTLE and "Minor A" agreed to meet at Helke Park that day. "Minor A" went to the park and approached CASTLE. "Minor A"

¹CASTLE was born April 1966 and was 45 years old when he arrived in the United States.

advised that CASTLE was older than she expected but “felt bad that he traveled all this way” or words to that effect. “Minor A” then hugged CASTLE.

17. Between June 21, 2011, and July 8, 2011, “Minor A” advised that she spent a great deal of time with CASTLE both at his hotel and elsewhere. “Minor A” advised that CASTLE took her out to restaurants and went shopping at various locations. “Minor A” advised that CASTLE met and hung out with a number of her friends during his trip to Ohio. “Minor A” advised that on the second day spent together they returned to his hotel, the Best Western, and engaged in sexual intercourse. “Minor A” advised that CASTLE had brought approximately three condoms with him. Over the course of his trip, “Minor A” advised that they had sexual intercourse approximately nine times, eight at his hotel and once at her residence while her mother was away. “Minor A” further advised that she performed fellatio on CASTLE approximately three to five times and CASTLE performed cunnilingus on her approximately two to four times. “Minor A” advised that she last had sexual intercourse with CASTLE two days before he departed the United States.

18. “Minor A” advised that during CASTLE’s stay in Ohio, they traveled to Meijer for the purpose of purchasing items, including additional condoms. “Minor A” further advised that she gave CASTLE a Hello Kitty stuffed animal to take back with him. In addition, “Minor A” advised that CASTLE purchased an Ohio State University t-shirt that she wrote on in fluorescent markers. CASTLE had also purchased a Talent guitar for “Minor A” at a local pawn shop during his trip to Ohio and had written a love song/poem on it. In addition, CASTLE gave “Minor A” a blue jacket and a necklace charm bearing the initials “J” and “M” representing nicknames which CASTLE and “Minor A” used for one another during the course of some of their online chats and

communications. "Minor A" provided law enforcement with the guitar, jacket and necklace charm given to her by CASTLE.

19. After CASTLE returned to the United Kingdom, he communicated with "Minor A" via the Internet again and stated the "sex was amazing" or words to that effect.

20. On October 21, 2011, S/A Salloum and Det. Meade visited Dugan's Pawn Shop, located at 4625 North Dixie, Dayton, Ohio. The sales associate at Dugan's Pawn Shop was able to verify via the serial number listed on the Talent guitar that CASTLE purchased it from Dugan's Pawn Shop. Furthermore, the sales associated recalled that CASTLE had a British accent and was in the pawn shop with a girl. Det. Meade then showed the sales associate a picture of "Minor A" and asked if the girl in the photo was the same girl that was with CASTLE on July 1, 2011, when CASTLE purchased the guitar? The sales associate confirmed that it was indeed the same individual.

21. Continuing on October 21, 2011, S/A Salloum and Det. Meade traveled to Dollar Rent A Car located at 2700 West National Road, Vandalia, Ohio, and spoke with the rental agent that assisted CASTLE. The agent stated that CASTLE was "all punked out", wearing skinny jeans and black nail polish.

22. In November 2011, S/A Salloum learned of the following preliminary results from the forensic evaluation of the computer belonging to "Minor A". MVRCL Detective Doug Roderick advised that he recovered a number of images and fragments of chat logs between CASTLE and "Minor A" to include the following:

- a. a photograph of "Minor A" depicting her exposed belly with a diamond shape and the words "ily josh" drawn on it with a heart and an arrow pointing towards her vaginal area with the words "for josh";

- b. numerous photographs depicting CASTLE's overexposed face framed by a rose border;
- c. (1) [CASTLE's Screen name]: “* I push in and out, slowly getting faster, matching our breathing*”

[Minor A's Screen name]: “* my breaths get shorter and shorter as you get faster and faster; doesn't take my eyes off yours *”

[CASTLE's Screen name]: “* as I get faster, I lean down and kiss you deeply, pulling on your tongue and sucking it, pulling it in to my mouth so our lips touch*”

“* I get still faster, trying not to cum, I move my hand down and start to rub your clit with my finger *”

“* rubbing you as I fuck you *”

[Minor A's Screen name]: “* grinds my wet, pulsing clit against your cock as you fuck me, letting out small breaths, and breathing in sharper and sharper *”

[CASTLE's Screen name]: “* oh lawd, thats hot ,3 ily”

(2) from [CASTLE's Screen name] to [Minor A's Screen name]: “and I just want to see you, clothes optional <ss”;

(3) from [CASTLE's Screen name] to [Minor A's Screen name]: “[Minor A's nickname] likes to give Josh blueballs”...

from [Minor A's Screen name] to “[CASTLE's screen name] : “i still don't understand that..”

from [CASTLE's Screen name] to [Minor A's Screen name]: “oooh, blueballs, when you get a guy soo horny he wants to shoot his load, but doesn't, its like your balls swell up cause they want to explode”

(4) [CASTLE's Screen name] (2/15/2011 3:27:57 PM)??:? ??you make me happy????? ILY <3 js??????

[Minor A's Screen name] (2/15/2011 3:30:42 PM)??:? ?I love youuu too. <3?????

[CASTLE's Screen name] (2/15/2011 3:31:17 PM)??:? ??i just smiled, like *beaming* a cheesy one ??????????

[Minor A's Screen name] (2/15/2011 3:31:35 PM)?:? ?GOOD. >;D????

(5) [CASTLE's Screen name] (2/15/2011 3:42:32 PM)?:? ??i love you ??????????

[Minor A's Screen name] (2/15/2011 3:42:38 PM)?:? ?i love you too. c:????

[CASTLE's Screen name] (2/15/2011 3:44:38 PM)?:? ??sooo, what fun homework and stuff you got on tonight??????

[Minor A's Screen name] (2/15/2011 3:45:38 PM)?:? ?i gotta get a shower, thats about it. ;p????

[CASTLE's Screen name] (2/15/2011 3:45:52 PM)?:? ??thats not so bad then??????

[CASTLE's Screen name] (2/15/2011 3:46:04 PM)?:? ??let me know when you do that cause i need to wash mah hair??????

[Minor A's Screen name] (2/15/2011 3:46:09 PM)?:? ?okee. c:????

[CASTLE's Screen name] (2/15/2011 3:46:12 PM)?:? ??wanna share the water???? ??????

[CASTLE's Screen name] (2/15/2011 3:46:36 PM)?:? ??just a thought, yummeh <3??????

[Minor A's Screen name] (2/15/2011 3:48:53 PM)?:? ?OHYES.????

(6) [Minor A's Screen name] (2/15/2011 3:55:12 PM)?:? ?i couldn't help but think of you, alllll day longgg.????

[CASTLE's Screen name] (2/15/2011 3:55:39 PM)?:? ?????? welcome to my world <3??????

(7) [Minor A's Screen name] (2/15/2011 5:08:25 PM)?:? ?i love you. <3????

[CASTLE's Screen name] (2/15/2011 5:08:35 PM)?:? ??i love you too ????????????

[Minor A's Screen name] (2/15/2011 5:09:32 PM)?:? ?that put the biggest smile on my face, js.????

[Minor A's Screen name] (2/15/2011 5:09:32 PM)?:? ?<3????

[CASTLE's Screen name] 2/15/2011 5:09:53 PM)?:? ??im glad ???????????

[CASTLE's Screen name] (2/15/2011 5:10:01 PM)??:? ??i love smiling ??????????

[CASTLE's Screen name] (2/15/2011 5:10:57 PM)??:? ??i dunno why i said that, i think you have already guessed that i smile a LOT around you <3?????

[Minor A's Screen name] (2/15/2011 5:11:18 PM)??:? ?mhm. c: but hey, i love smiling too. <3????

[CASTLE's Screen name] (2/15/2011 5:11:57 PM)??:? ??yes, you do and its such a kissable smile ??????????

[CASTLE's Screen name] (2/15/2011 5:12:29 PM)??:? ??permission to bite your bottom lip?????????

[CASTLE's Screen name] (2/15/2011 5:22:26 PM)??:? ??argh, its no good, I need to go and do stuff???? ill be back in a lil while and hey, LOVE YOU <3?????

[Minor A's Screen name] (2/15/2011 5:33:24 PM)??:? ?love you too. <3????

(8) [CASTLE's Screen name] (2/15/2011 7:17:53 PM)??:? ??i fucking love you with all my heart?????

[CASTLE's Screen name] (2/15/2011 7:18:11 PM)??:? ??i guess you didnt see the post and the picture about my PASSPORT APPLICATION ??????????

[Minor A's Screen name] (2/15/2011 7:19:09 PM)??:? ?yeah, no, i saw that. ????????

[CASTLE's Screen name] (2/15/2011 7:19:47 PM)??:? ??well then, know Im serious then?????

[Minor A's Screen name] (2/15/2011 7:26:14 PM)??:? ?i do. urgh, i just need to calm down.????

(9) [CASTLE's Screen name] (2/15/2011 7:29:05 PM)??:? ??and, you will see me?????

[CASTLE's Screen name] (2/15/2011 7:29:11 PM)??:? ??this summer, js?????

[Minor A's Screen name] (2/15/2011 7:29:48 PM)??:? ?AGH, *JIZZ*????

[Minor A's Screen name] (2/15/2011 7:29:53 PM)??:? ?jeez, every time you say that.????

[Minor A's Screen name] (2/15/2011 7:29:53 PM)?:? ?xD?????

[CASTLE's Screen name] (2/15/2011 7:30:24 PM)?:? ??i was not wanting to tell you that yet, but I guess in a way shes prompted me ??????????

[CASTLE's Screen name] (2/15/2011 7:30:42 PM)?:? ??the song?????

[CASTLE's Screen name] (2/15/2011 7:30:46 PM)?:? ??the promise?????

[CASTLE's Screen name] (2/15/2011 7:30:52 PM)?:? ??is about my promise to you?????

[CASTLE's Screen name] (2/15/2011 7:31:04 PM)?:? ??and what i wanted as a [romise from you?????

[Minor A's Screen name] (2/15/2011 7:33:21 PM)?:? ?<3?????

[Minor A's Screen name]: (2/15/2011 7:33:31 PM)?:? ?i'm speechless bby, i love you so much. <3?????

[CASTLE's Screen name] (2/15/2011 7:33:42 PM)?:? ??thank fuck <3?????

[CASTLE's Screen name] (2/15/2011 7:33:56 PM)?:? ??we are stronger and better than everyone else?????

[CASTLE's Screen name] (2/15/2011 7:35:16 PM)?:? ??i was looking for a post i made a lil while back?????

[CASTLE's Screen name] (2/15/2011 7:35:20 PM)?:? ??i found it?????

[CASTLE's Screen name] (2/15/2011 7:35:32 PM)?:? ??"I'm standing tall, none of you little bastards will grind me down, you can all go get fucked."?????

[CASTLE's Screen name] (2/15/2011 7:36:05 PM)?:? ??the doubters, shit stirrers, those who would se us fail, can all go get fucked?????

[Minor A's Screen name] (2/15/2011 7:42:22 PM)?:? ?yeah, i needed to hear those words. <3?????

[CASTLE's Screen name] (2/15/2011 7:42:48 PM)?:? ??you are my EVERYTHINg?????

[CASTLE's Screen name] (2/15/2011 7:42:55 PM)?:? ??i mean that with all my heart?????

23. A review of the Ohio Revised Code by your affiant confirmed that the sexual activity in which CASTLE engaged in with "Minor A" are violations of the Ohio Revised Code, - namely, unlawful sexual conduct with a minor, in violation of the Ohio Revised Code, Section 2907.04(A) and (B), and importuning in violation of Ohio Revised Code, Sections 2907.07(B) and 2907.07(D).

Ohio Revised Code Section 2907.04(A) and (B) provides in pertinent part that:

(A) No person who is eighteen years of age or older shall engage in sexual conduct with another, who is not the spouse of the offender, when the offender knows the other person is thirteen years of age or older but less than sixteen years of age, or the offender is reckless in that regard.

(B) Whoever violates this section is guilty of unlawful sexual conduct with a minor.

Ohio Revised Code, Section 2907.07 provides in pertinent part that:

(B) No person shall solicit another, not the spouse of the offender, to engage in sexual conduct with the offender, when the offender is eighteen years of age or older and four or more years older than the other person, and the other person is thirteen years of age or older but less than sixteen years of age, whether or not the offender knows the age of the other person.

(D) No person shall solicit another by means of a telecommunications device, as defined in section 2913.01 of the Revised Code, to engage in sexual activity with the offender when the offender is eighteen years of age or older and either of the following applies:

(1) The other person is thirteen years of age or older but less than sixteen years of age, the offender knows that the other person is thirteen years of age or older but less than sixteen years of age or is reckless in that regard, and the offender is four or more years older than the person.

(F)(1) Whoever violations these sections is guilty of importuning.

24. S/A Salloum has reviewed the US-VISIT photograph taken of CASTLE when he arrived/entered into the United States in June 2011. During early November, S/A Salloum and

HSI S/A Christopher Wallace interviewed multiple acquaintances of “Minor A.” During these interviews, special agents showed the US-VISIT photograph to those interviewed. When asked if they recognized the person in the photograph, multiple acquaintances of “Minor A” identified the person in the US VISIT photograph as “Josh”, “Josh Fade” or “Joshua Parker”, and individual that they knew either from online contact or having personally met through “Minor A” during the summer of 2011, in the Dayton, Ohio area. During the course of interviews with “Minor A”, she identified the aforementioned as names or nicknames for CASTLE. Furthermore, in November of 2011, “Minor A” made a positive identification of the aforementioned US-VISIT photograph of CASTLE, as the person she knew as Richard Joshua Parker.

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CONCLUSION

25. Based on the aforementioned factual information, your affiant respectfully submits that there is probable cause to believe that between in or about March 2009 and June 2011, in the Southern District of Ohio and elsewhere, defendant RICHARD CASTLE knowingly used any facility of interstate or foreign commerce, to knowingly persuade, induce, entice and coerce any individual who had not attained the age of 18 years - - namely, a minor identified as "Minor A" - - to engage in any sexual activity for which any person could be charged with an offense - - namely, unlawful sexual conduct with a minor, in violation of the Ohio Revised Code, Section 2907.04(A) and (B), and importuning in violation of Ohio Revised Code, Section 2907.07(B) and (D)(1), all in violation of 18 U.S.C. § 2422(b). Your affiant further submits that there is probable cause to believe that in or around June 2011, in the Southern District of Ohio and elsewhere, defendant RICHARD CASTLE traveled in interstate and foreign commerce - namely, from the United Kingdom to Ohio - for the purpose of engaging in any illicit sexual conduct with another person, namely - - a minor identified as "Minor A", in violation of 18 U.S.C. § 2423(b).



Mark Salloum
Special Agent
Homeland Security Investigations

Subscribed and sworn to before
me this 10 day of December, 2011



ATTACHMENT A

COUNT 1
[18 U.S.C. § 2422(b)]

Between in or about March 2009 and June 2011, in the Southern District of Ohio and elsewhere, defendant **RICHARD CASTLE, aka RICHARD PARKER, aka RICHARD JOSHUA PARKER aka JOSH FADE aka JOSH** knowingly used any facility of interstate or foreign commerce, to knowingly persuade, induce, entice and coerce any individual who had not attained the age of 18 years - - namely, a minor identified herein as "Minor A" - - to engage in any sexual activity for which any person could be charged with an offense - - namely, unlawful sexual conduct with a minor, in violation of the Ohio Revised Code, Section 2907.04(A) & (B), and importuning in violation of Ohio Revised Code, Section 2907.07(B) and (D)(1).

In violation of 18 U.S.C. § 2422(b).

COUNT 2
[18 U.S.C. § 2423(b)]

In or around June 2011, in the Southern District of Ohio and elsewhere, defendant **RICHARD CASTLE, aka RICHARD PARKER, aka RICHARD JOSHUA PARKER aka JOSH FADE aka JOSH** traveled in interstate and foreign commerce - namely, from the United Kingdom to Dayton, Ohio - for the purpose of engaging in any illicit sexual conduct with another person, namely - - "Minor A"

In violation of 18 U.S.C. § 2423(b).